

Plaintiff agrees to the above conditions and wishes to dismiss her claims against Brand Defendants in the instant lawsuit without prejudice to re-filing. There are no counter-claims or third-party claims. Nothing in this Joint Motion shall constitute a waiver of any rights or defenses the Brand Defendants may have in any litigation that concerns or relates to the subject matter of this action.

WHEREFORE, the parties hereto stipulate to the dismissal of the claims of Plaintiff against Brand Defendants in the above-styled lawsuit without prejudice to re-filing, subject to the conditions stated above.

HEPLERBROOM LLC

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October 2013, I electronically filed this Joint Motion to Dismiss without Prejudice with the Clerk of Court using the Court's CM/ECF system, which sent notification of such filing to the attorneys of record herein.

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